



November 11, 2020

Via Email/Sharefile

Mr. Andrew Park
Hazardous Waste Programs Branch
US Environmental Protection Agency Region 2
290 Broadway, 22nd Floor
New York, New York 10007-1866

**Re: Former Hess Training Center
881 West Avenue
Block 664.03, Lot 1.01 (former Lots 1, 2.01, 2.02 and 4)
Hess Corporation Former Port Reading Complex (HC-PR)
750 Cliff Road
Woodbridge, Middlesex County, New Jersey
NJDEP PI# 006148
ISRA Case No. E20130449
EPA ID No. NJD045445483**

Dear Mr. Park:

Earth Systems, Inc. (Earth Systems) has prepared this letter on behalf of Hess Corporation (Hess) regarding the former Hess Training Center and its relationship to the Former Port Reading Complex.

Due to historic operations, the Former Port Reading Complex (Site) is jointly regulated by both the New Jersey Department of Environmental Protection (NJDEP) and the Environmental Protection Agency (EPA). The NJ Industrial Site Recovery Act (ISRA) was triggered when Hess executed an agreement to sell the Port Reading Complex to Buckeye Partners, LP (Buckeye) in 2013. The Site is also regulated under EPA's Resource Conservation and Recovery Act (RCRA) since former operations at the Site required the treatment, storage, and disposal of hazardous wastes.

As discussed below, the Training Center should not be included as part of the former refinery "Site." Therefore, the Training Center is not regulated under ISRA or RCRA regulations.

Training Center Background Information

The former Training Center was located on Block 664.03, Lots 1, 2.01, 2.02, and 4 (see **Figure 1**). The former Training Center was utilized by Hess from approximately 1992 through 2013. The Training Center was used for engineering offices and personnel training purposes. No industrial operations were conducted at the Training Center. The Training Center was located on West Street with access from a driveway located on Milos Way. The Training Center property was, and remains, separated from the Site by a separate parcel (Block 12000.03, Lot 11) owned and operated by Conrail.

In 2013, Hess sold the Site to Buckeye. Hess retained ownership on three separate out parcels that were not part of the terminal/refinery operations, including the Training Center parcel. When ISRA was triggered and the General Information Notice (GIN) submitted to DEP, the GIN did not identify the Training Center as part of the Industrial Establishment that was being transferred to Buckeye. A copy of the GIN has been included with this letter.

The Training Center parcel was eventually donated to Woodbridge Township on September 28, 2016 and is currently used as a recreation center. As part of the property transfer, the Woodbridge Township environmental consultant (Peak Environmental) conducted a Preliminary Assessment for the parcel and identified 3 Areas of Concern (AOCs) which required additional investigation/remediation. Peak completed the investigation and remediation for the parcel and the Licensed Site Remediation Professional (LSRP) of record issued the following AOC specific Response Action Outcome (RAO) on September 15, 2017:

- Unrestricted Use RAO for AOC-1 550-Gallon No. 2 Heating Oil UST, AOC 2 – 1,000-Gallon No. 2 Heating Oil UST, AOC 3 – Lead Impacted Soil (Spill Cases – 16-07-21-1610-00, 16-07-21-1613-29, 16-08-10-1519-30)

A copy of the 2017 RAO is included with this letter.

ISRA

The former Training Center is not an "Industrial Establishment" as defined under ISRA at NJAC 7:26B-1.4:

"Industrial establishment" means any place of business or real property at which such business is conducted, having the North American Industry Classification System (NAICS) codes listed in chapter Appendix C, incorporated herein by reference, dated and published in 2002 by the Executive Office of the President of the United States, Office of Management and Budget, ISBN 0-934213-87-9 NTIS PB2002-502024, subject to the specified exceptions and limitations and engaged in operations on or after December 31, 1983, which involve the generation, manufacture, refining, transportation, treatment, storage, handling, or disposal of hazardous substances and wastes on-site, above or below ground unless otherwise

provided at N.J.A.C. 7:26B-2.1. For properties which are owner occupied or are leased to a single tenant, the industrial establishment includes all of the block(s) and lot(s) upon which the business is conducted and those contiguous block(s) and lot(s) controlled by the same owner or operator that are vacant land, or that are used in conjunction with such business. For leased properties with two or more leased spaces, the industrial establishment includes the leasehold and any areas of concern that provide, are associated with, or are utilized for, hazardous substances and wastes to or from the leasehold, regardless of their location.

As mentioned above, the Training Center parcel is not contiguous to the Site. There is a separate parcel owned and operated by Conrail that separates the Training Center from the Site,

Further, the ISRA regulations expressly exclude administrative support operations from being regulated as ISRA-subject industrial establishments at NJAC 7:26B-2.1(b):

(b) The following operations are not industrial establishments:

2. Any office, located on a separate tax lot and block from the industrial establishment it serves, in which personnel are engaged primarily in general administrative, personnel, supervisory, accounting, purchasing, engineering and systems planning, advertising, legal, financial, sales or other related management functions provided however this "office" exemption shall not apply where separate lots and blocks are or have been established after December 31, 1983, at the site of an existing industrial establishment;

In the case of the Training Center, it served solely for office and personnel training and was not used for industrial operations that occurred on the Site. In addition, the Training Center was located on a separate lot and block. Therefore, the Training Center would not be an Industrial Establishment under ISRA.

We do note that the underground storage tanks at the Training Center were referenced as an Area of Concern in the Preliminary Assessment that was prepared for the ISRA matter for the Site. That reference was a mistake by the LSRP at the time. As mentioned earlier, the Training Center property was not identified as part of the Industrial Establishment in the GIN and the presence of USTs at the Training Center should not have been identified as AOCs associated with the refinery/terminal operations. As explained above, the USTs were removed as part of redevelopment and a RAO was issued by the LSRP retained by the Township of Woodbridge.

RCRA

In addition, the former Training Center should not be included as part of the Site for RCRA purposes. The Block and Lots for the Training Center parcel were not included in the 1985/1993 NJPDES/RCRA Permit Fact Sheet or permit map (both are attached). As stated above, no operations were conducted at the former Training Center.

Conclusions

The former Training Center is located on separate Block and Lots from the former refinery and is not contiguous to the Site. The former Training Center was only ever used for personnel training purposes and no operations were ever conducted at the former Training Center. Therefore, as per the ISRA regulations, the parcel is not regulated under ISRA. In addition, the Block and Lots containing the former Training Center were never included as part of the "Site" description during the RCRA permitting process.

Hess/Earth Systems proposes to delete the former Training Center AOC from the Site Case Inventory Document (CID). However, if deleting an AOC from a CID is not possible, Hess/Earth Systems proposes to update the notes section of the CID to explain that the AOC has been removed from the "Site" since the separate parcel is not regulated under ISRA. Regarding RCRA, the Block and Lots were never included as part of the RCRA permit, so no changes to the RCRA permit are necessary. However, for clarification purposes, the EPA can issue an approval of this letter to document that the former Training Center is not considered part of the "Site" for RCRA purposes.

Should you have any questions or require additional clarification or information, please contact me at 732-739-6444 or via e-mail at ablake@earthsys.net. If you have any questions relating to the project and schedule moving forward, you can also contact Mr. John Schenkewitz of Hess Corporation at 609-406-3969.

Sincerely,

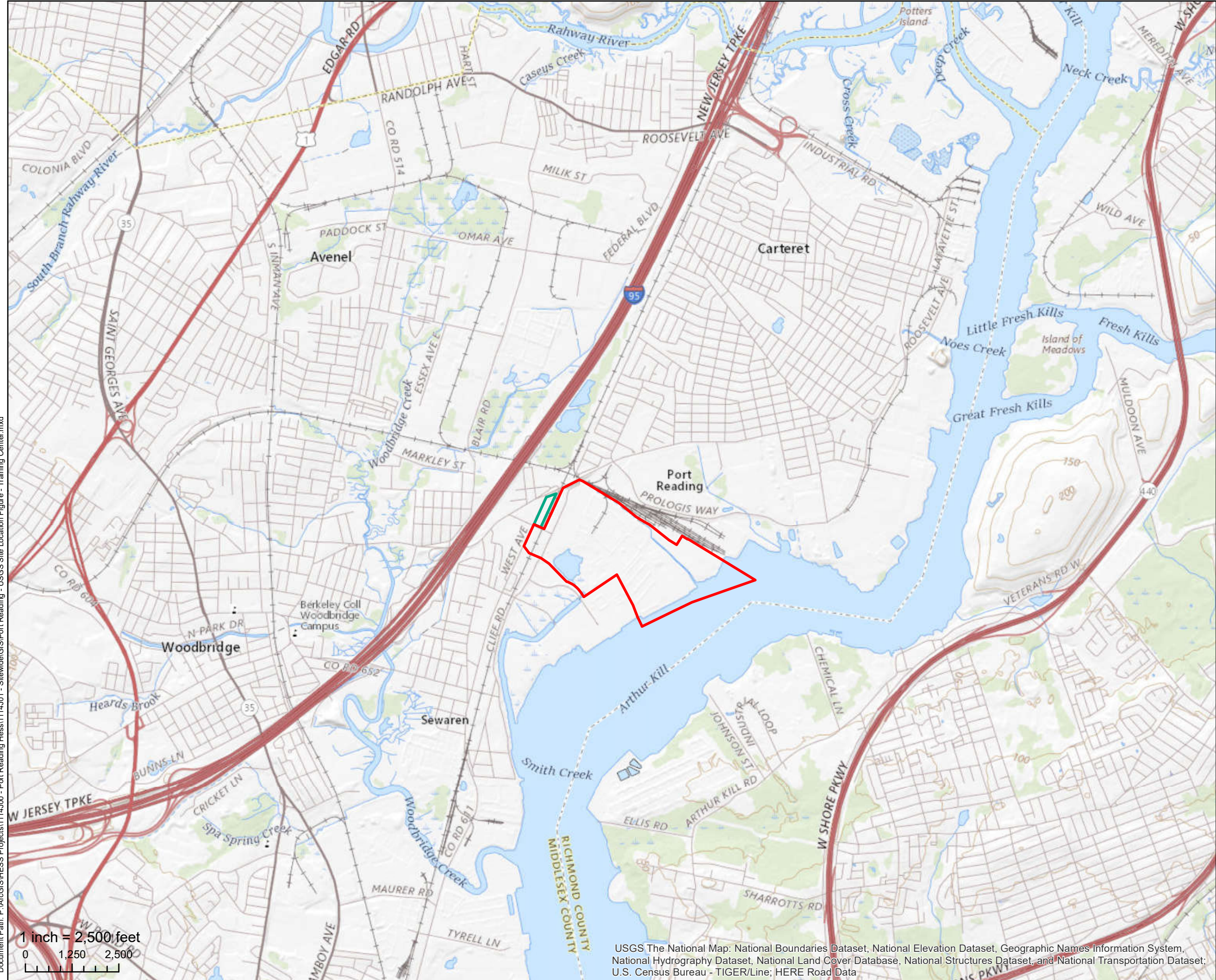


Amy Blake
Sr. Project Manager

- c. Ms. Julia Galayada - NJDEP (via email/Sharefile)
- Mr. Jay Nickerson – NJDEP (via email/Sharefile)
- Ms. Gwen Zeras – NJDEP (via email/Sharefile)
- Mr. Nidal Azzam – EPA (via email/Sharefile)
- Mr. Adolph Everett – EPA (via email/Sharefile)
- Mr. John Schenkewitz – Hess Corporation (via e-mail)
- Mr. Brian Epperson – Hess Corporation (via email)
- Mr. Rick Ofsanko – Earth Systems (via e-mail)
- Mr. John Virgie – Earth Systems (via e-mail)

Attachments

- Figure 1 – USGS Site Location Map
- 2013 General Information Notice (GIN)
- 2017 Response Action Outcome Letter (with 2019 administrative RAO amendment)
- 1985 RCRA/IWMF/NJPDES Permit No. NJ002878, EPA ID NJD0455445483 – Permit Fact Sheet
- 1993 RCRA/IWMF/NJPDES Permit No. NJ002878, EPA ID NJD0455445483 – Permit Fact Sheet
- 1993 RCRA/IWMF/NJPDES Permit No. NJ002878, EPA ID NJD0455445483 – Permit Map



LEGEND

Port Reading Site Boundary

Training Center Location Boundary

Training Center Location
881 West Ave Port Reading NJ
Block 664.03 Lots: 1, 2.01, 2.02, 4

NEW JERSEY QUADRANGLE LOCATION:
JERSEY CITY, NEW JERSEY

Figure 1: USGS Site Location Map

**HESS CORPORATION
FORMER PORT READING COMPLEX
750 CLIFF ROAD
PORT READING, NEW JERSEY**

Project #:	1114J01	Drawn:	4/16/2020
SRP PI#:	006148	Drawn By:	KJ

Earth Systems

Environmental Engineering
1625 Highway 71, Belmar, NJ 07719
T. 732.739.6444 | F. 732.739.0451

This map was developed using New Jersey Department of Environmental Protection Geographic Information System Digital Data, but this secondary product has not been verified by NJDEP and is not state Authorized. Source: NAD 1983 (2011) New Jersey State Plane FIPS 2900 US FT.



New Jersey Department of Environmental Protection
Site Remediation Program

GENERAL INFORMATION NOTICE (GIN)

☒ New ☐ Revision/Update *

Date Stamp
(For Department use only)

NOTE: If more than one Industrial Establishment (business) operates at the site (multiple tenancy), and the transaction which initiates ISRA is a sale of property, then a separate General Information Notice is required for each Industrial Establishment (tenant) that uses hazardous materials and has a NAICS number within the subject realm of ISRA.

* If the submission is a revision/update, Fill out **only** the ISRA Case Number and PI Number in Section A and then **only** the fields being revised or updated in Sections B through J. The certification, (Section K), must be also be completed.

SECTION A. INDUSTRIAL ESTABLISHMENT

Site Name: Former Hess Port Reading Complex Telephone Number: (732) 750-1719

Street Address: 750 Cliff Road

Municipality: Woodbridge (Township, Borough or City)

County: Middlesex Zip Code: 07064

* ISRA Case No.: _____ * Program Interest No.: 006148

State Plane Coordinates for a central location at the site: Easting: 561544 Northing: 630878

Municipal Block(s) and Lot(s):

Block # <u>756</u>	Lot # <u>3 & 6</u>	Block # <u>760.01</u>	Lot # <u>2 & 3</u>
Block # <u>756.01</u>	Lot # <u>2</u>	Block # <u>760.02</u>	Lot # <u>1, 2 & 3</u>
Block # <u>756.02</u>	Lot # <u>1</u>	Block # <u>1095</u>	Lot # <u>6</u>
Block # <u>757</u>	Lot # <u>1</u>	Block # <u>664.01</u>	Lot # <u>1.01 & 1.02</u>

Does the Industrial Establishment include: ☒ the Entire Site; or
☐ a Leasehold Portion of the Block and Lots designated above.

Date trigger compliance with N.J.A.C. 7:26B-3.2(a) 10/09/2013

NAICS Code: 324110; 424710 (Required)

To determine your NAICS Code, please refer to the "Official NAICS Page" at <http://www.census.gov/eos/www/naics/> or contact the NJ Department of Labor at 609-292-2633.

Please provide a description of operations conducted on site by the Industrial Establishment listed in "A" above to verify the listed NAICS number as accurate.

Refining and Bulk storage of petroleum products.

Is this site a Federal Case? ☒ Yes ☐ No

If "Yes," check all that apply

☒ RCRA GPRA 2020 ☐ CERCLA/NPL ☐ USDOD ☐ USDOE ☐ TSCA

☐ Other (explain): _____

SECTION B. CONTACT INFORMATION

Current Property Owner(s)

Business Name: Hess Corporation

Contact Person: John Engdahl Telephone Number: (732) 750-6934

Street Address: One Hess Plaza

Municipality: Woodbridge State: NJ Zip Code: 07095

Current Business Owner (complete this section even if the same as above)Business Name: Hess CorporationContact Person: John Engdahl Telephone Number: (732) 750-6934Street Address: One Hess PlazaMunicipality: Woodbridge State: NJ Zip Code: 07095**SECTION C. MAPS TO PROVIDE**

1. A current tax map, attached as Appendix # 1 and
2. A scaled site map showing the entire property and all current structures located on the blocks and lots listed in Item 1A above. For NJDEP data entry and identification purposes the boundaries of each industrial establishment currently located on the site shall be highlighted and clearly labeled on the scaled site map, attached as Appendix # 2.

SECTION D. PREVIOUS ISRA/ECRA SUBMISSIONS

1. Have there been any previous or concurrent ISRA/ECRA submissions (including Applicability Determinations or De Minimis Quantity Exemption Application) by this Industrial Establishment or another Industrial Establishment, which occupied the same tax block and lot number? ☐ Yes ☒ No
2. If "Yes," Name of Industrial Establishment(s): _____
3. ISRA\ECRA Case No(s): _____ Current Status _____

SECTION E. NFA, RAO OR NEGATIVE DECLARATION

Has the same property occupied by the Industrial Establishment in Section A above received a No Further Action Letter (NFA), Response Action Outcome (RAO) or Negative Declaration Approval? ☐ Yes ☒ No

If "Yes," provide :

1. A copy of the prior No Further Action Letter, Response Action Outcome or Negative Declaration Approval, attached as Appendix # _____ and
2. A scaled site map, which clearly depicts the site or portions thereof that the prior No Further Action Letter, Response Action Outcome or Negative Declaration Approval includes, attached as Appendix # _____.

Please Note: If the Block and Lot designation for the site on which the Industrial Establishment listed above is different than the Block and Lot listed on the prior No Further Action Letter, Response Action Outcome or Negative Declaration Approval, then please provide a brief description of when the designation change occurred and a statement supporting that the current application is for the same site. The Department will not assume the application for the current site is the same site referenced on a prior no further action approval if the Block and Lots are different.

SECTION F. TYPE OF TRANSACTION

Indicate the transaction(s), which initiates the ISRA review. Check **all** that apply (see N.J.A.C. 7:26B-3.2 & 3.3):

- | | | |
|---|---|--|
| <input checked="" type="checkbox"/> Sale of Property | <input type="checkbox"/> Foreclosure | <input type="checkbox"/> Stock Transfer/Corporate Merger |
| <input type="checkbox"/> Cessation | <input type="checkbox"/> Partnership Change | <input type="checkbox"/> Other (attach documentation to explain) |
| <input checked="" type="checkbox"/> Sale of Business | <input type="checkbox"/> Sale of Assets | |
| <input type="checkbox"/> Bankruptcy – Type: _____ Date: _____ Case #: _____ | | |

SECTION G. CESSATION OF OPERATIONS

If a cessation of operations is involved at this location, provide the following information:

1. Provide the date of the public release of the decision to close the facility _____, or
2. Provide the date that operations ceased _____, or
3. Provide the date that operations will cease _____

SECTION H. PROPERTY SALE/TRANSFER OF TITLE

If the transaction initiating an ISRA review is an agreement of sale or execution of an option to purchase, fill in the date of execution of that instrument below. If a sales agreement has not been signed, then you may not have triggered ISRA unless another trigger such as a cessation of operations has also occurred.

1. Is a sale involved? ☒ Yes ☐ No (If "No," skip to section I.)
2. Provide the date of the Agreement/Notifications of Option to Purchase 10/09/2013

3. Provide the date proposed for transfer of title 12/31/2013

4. Please complete the following:

Name of Party/Purchaser: Buckeye Partners, LP

Address: Five TEK Park, 9999 Hamilton Blvd., Breingsville, PA 18031

Phone Number: (610) 904-4494

Contact Person: Katherine Zeth: Manager, Remediation

SECTION I. AUTHORIZED AGENT

Provide the name and mailing address of an individual to be designated as the "Authorized Agent": a primary contact with the Department for all matters relating to this ISRA review. This can be a licensed site remediation professional or attorney assisting the owner or operator with their ISRA compliance obligations. The Department will copy the Authorized Agent on all written correspondence.

Name: William Pufko, Esq

Telephone Number: (212) 536-8572

Firm: Hess Corporation- Legal Department

Street Address: 1182 Avenue of Americas

Municipality: New York City

State: NY

Zip Code: 10036

Fax Number: _____ Email Address (optional): WPufko@hess.com

SECTION J. NOTIFICATIONS (To be initialed by the signatory on the certification page.)

Right of Entry and Inspection

Pursuant to the Industrial Site Recovery Act rules (N.J.A.C. 7:26B-1.9), by the submission and certification of this document I give my consent to the entry of the industrial establishment by the NJDEP and its authorized representatives during any phase of remediation, upon the presentation of credentials, to inspect the site.

Initial _____

Withdrawal Notification

I understand that I may withdraw this notice if the transaction that initiated the filing of this General Information Notice is terminated. In accordance with the Industrial Site Recovery Act rules (N.J.A.C. 7:26B-3.4), such withdrawal, stating the reasons why compliance with ISRA no longer applies to the site referenced in Item 1A above, shall be made in writing and certified in accordance with N.J.A.C. 7:26B-1.6. I understand if the site has been confirmed to be contaminated, pursuant to the Site Remediation Reform Act, I am obligated to continue with the remediation of the site regardless of the status of my ISRA trigger.

Initial _____

Municipal Notification

I certify that the municipality (Municipal Clerk), in which the industrial establishment named in Item 1A above is located, has been provided a copy of this notice.

Initial _____

SECTION K. PERSON RESPONSIBLE FOR CONDUCTING THE REMEDIATION INFORMATION AND CERTIFICATIONFull Legal Name of the Person Responsible for Conducting the Remediation: Hess CorporationRepresentative First Name: John Representative Last Name: EngdahlTitle: Senior SpecialistPhone Number: (732) 750-6934 Ext: _____ Fax: (732) 750-6805Mailing Address: One Hess PlazaCity/Town: Woodbridge State: NJ Zip Code: 07095Email Address: JEngdahl@hess.comDoes the listed individual or firm own the: ☐ property, ☐ business, or ☒ both?

This certification shall be signed by the responsible party who is submitting this notification in accordance with Administrative Requirements for the Remediation of Contaminated Sites rule at N.J.A.C. 7:26C-1.5(a).

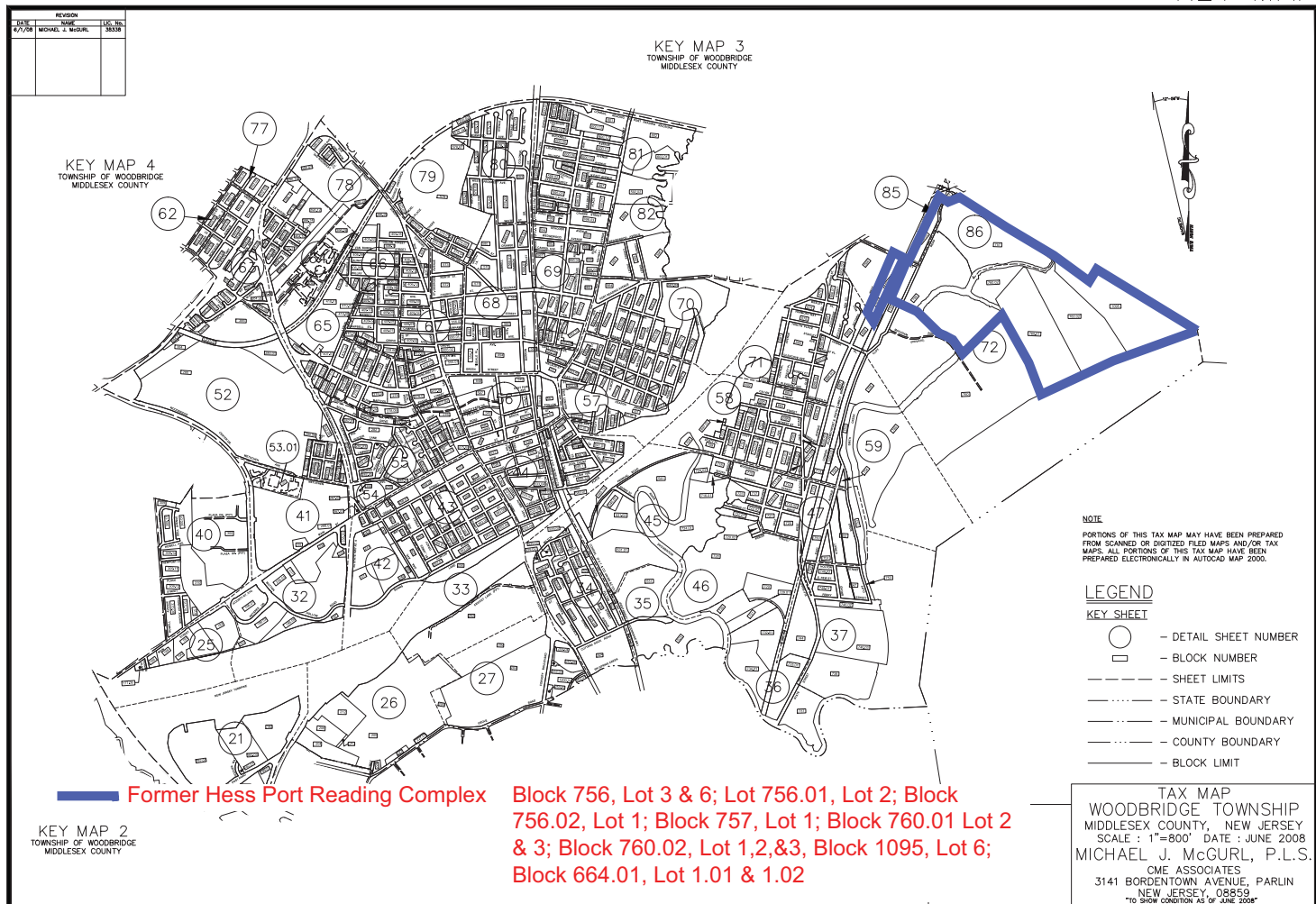
I certify under penalty of law that I have personally examined and am familiar with the information submitted herein, including all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.

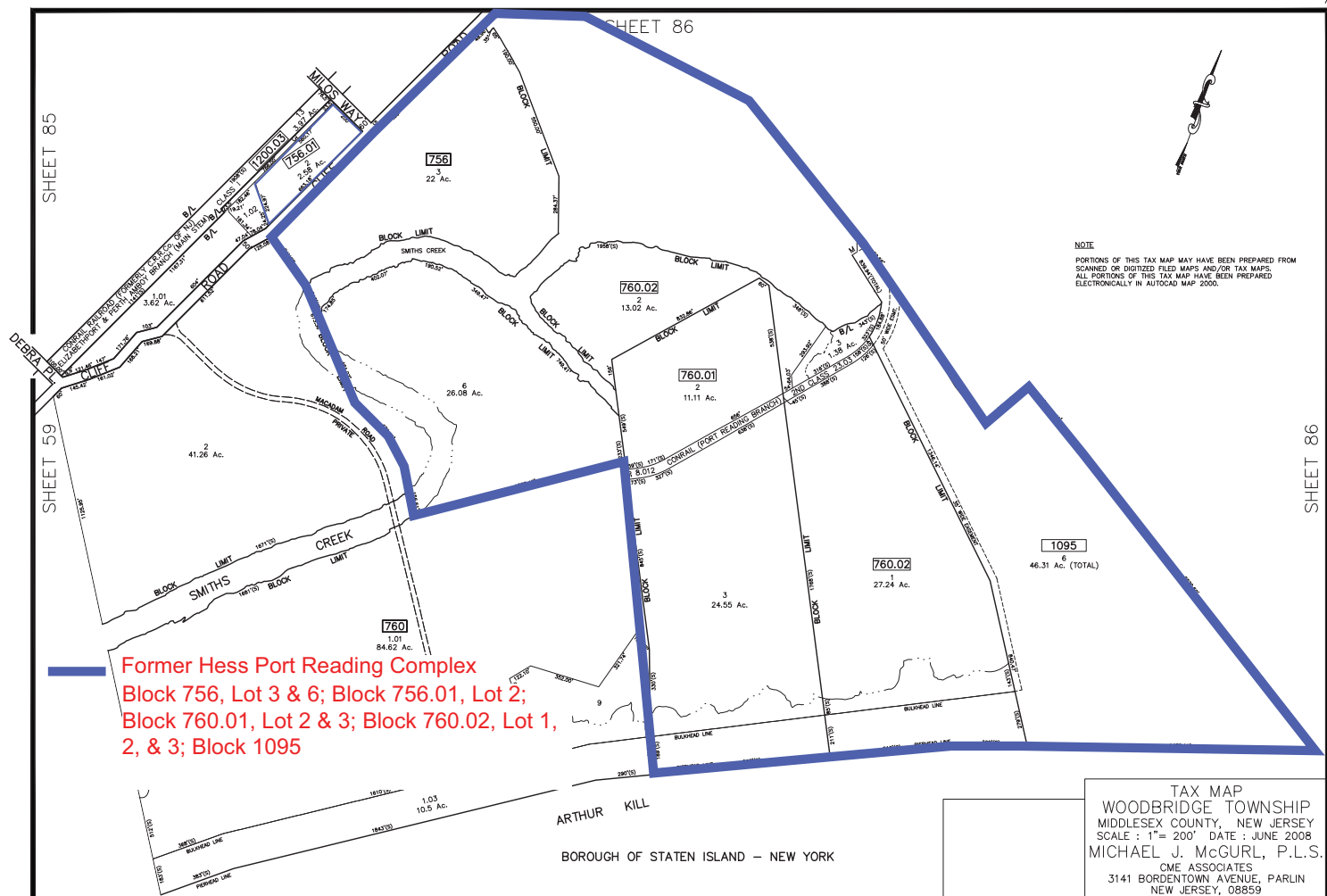
Signature: _____ Date: _____

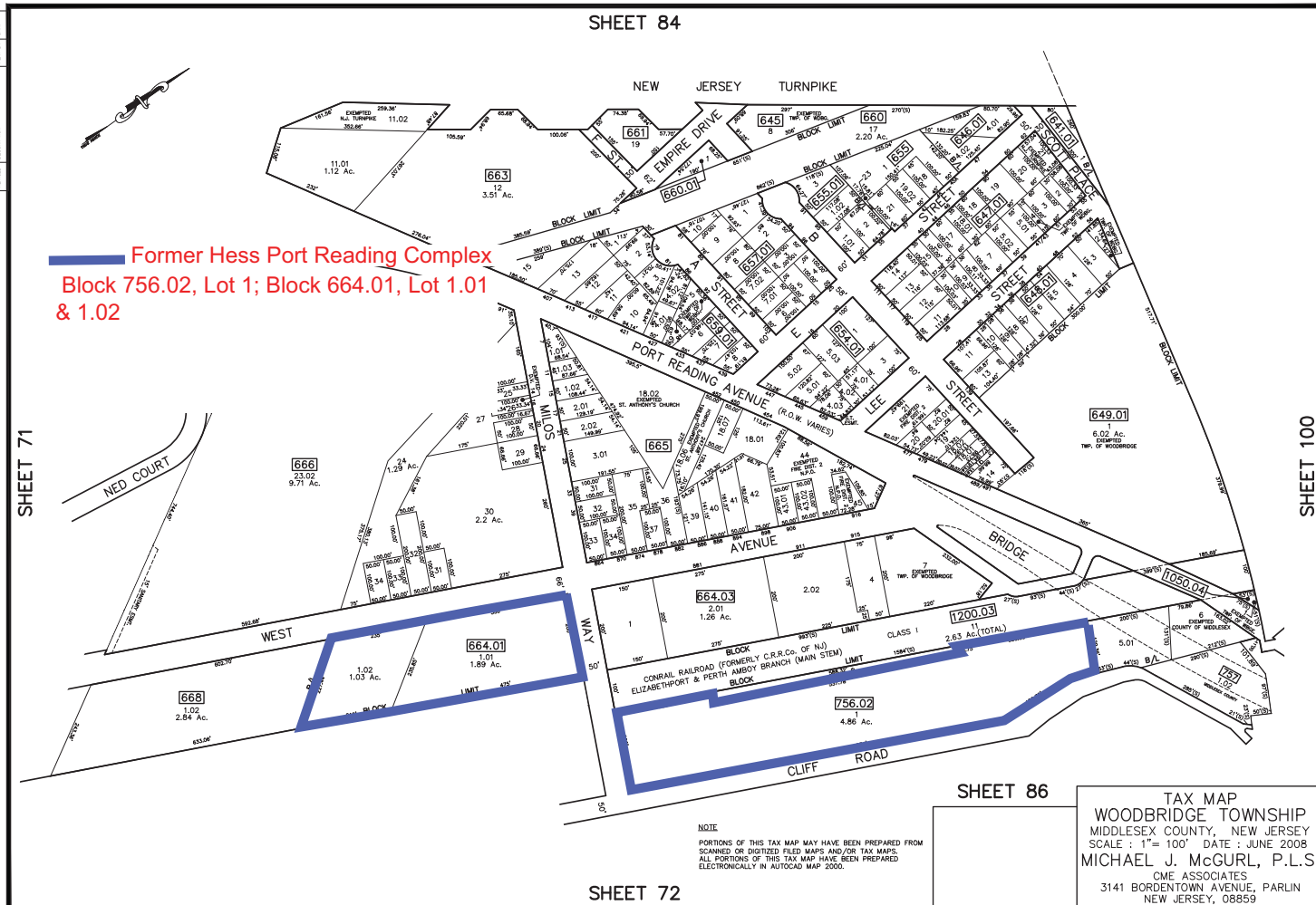
Name/Title: John Engdahl@hess.com**No Changes Since Last Submittal** ☐

Completed forms should be sent to:

Bureau of Case Assignment & Initial Notice
Site Remediation Program
NJ Department of Environmental Protection
401-05H
PO Box 420
Trenton, NJ 08625-0420







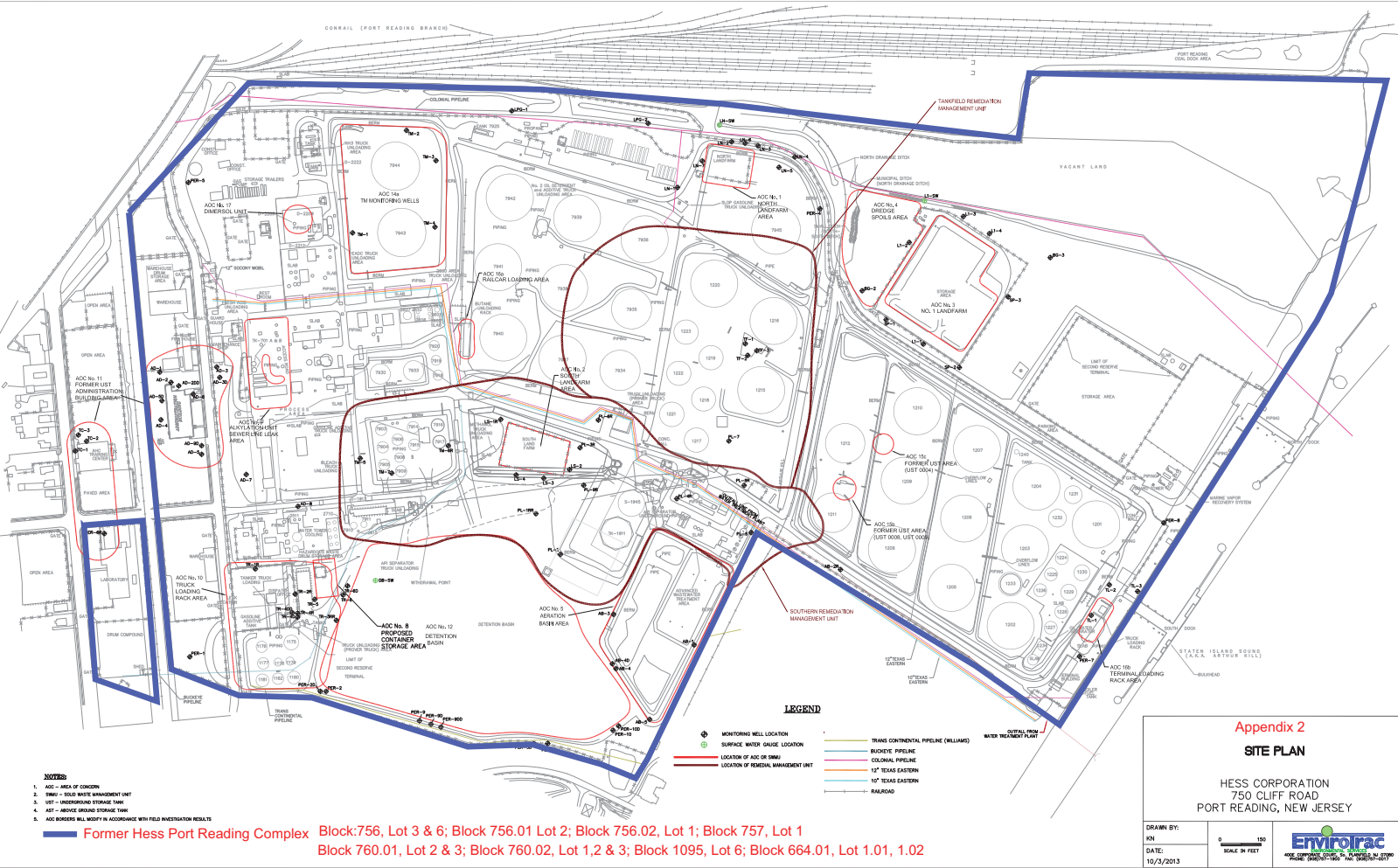
TAX MAP
WOODBRIDGE TOWNSHIP
MIDDLESEX COUNTY, NEW JERSEY
SCALE : 1"= 200' DATE : JUNE 2008
MICHAEL J. MCGURL, P.L.S.
CME ASSOCIATES
3141 BORDENTOWN AVENUE, PARLIN
NEW JERSEY, 08859

NOTE

PORTIONS OF THIS TAX MAP MAY HAVE BEEN PREPARED FROM
SCANNED OR DIGITIZED FILED MAPS AND/OR TAX MAPS.
ALL PORTIONS OF THIS TAX MAP HAVE BEEN PREPARED
ELECTRONICALLY IN AUTOCAD MAP 2000.

SHEET 72

86



- NOTES**
1. AOC - AREA OF CONCERN
 2. REM - REMEDIATION MANAGEMENT UNIT
 3. VET - VENTILATION STORAGE TANK
 4. AET - ABOVE-GROUND STORAGE TANK
 5. AOC BOUNDARY WILL VARY IN ACCORDANCE WITH FIELD INVESTIGATION RESULTS

Former Hess Port Reading Complex Block:756, Lot 3 & 6; Block 756.01 Lot 2; Block 756.02, Lot 1; Block 757, Lot 1
Block 760.01, Lot 2 & 3; Block 760.02, Lot 1,2 & 3; Block 1095, Lot 6; Block 664.01, Lot 1.01, 1.02

Appendix 2
SITE PLAN

HESS CORPORATION
750 CLIFF ROAD
PORT READING, NEW JERSEY

DRAWN BY:
KIN
DATE:
10/2/2013

0 100
SCALE IN FEET



March 7, 2019

Mr. Robert Landolfi
Township of Woodbridge
1 Main Street
Woodbridge, New Jersey 07095

Re: This correspondence amends and supplements the Response Action Outcome dated September 15, 2017

Remedial Action Type: *Unrestricted Use*

Scope of Remediation: Area(s) of Concern: AOC-1 - Unregulated 550-Gallon No. 2 Heating Oil UST; AOC-2 - Unregulated 1,000-Gallon No. 2 Heating Oil UST; AOC-3 - Lead Impacted Soil; and No Other Areas.

Case Name: Amerada Hess Corp Recreation Center

Address: 881, 911 & 915 West Avenue

Municipality: Woodbridge

County: Middlesex

Block: 664.03 **Lots:** 1, 2.01, 2.02, 4

Preferred ID: 022902

Communication Center #16-07-21-1610-00; 16-07-21-1613-29; 16-08-10-1519-30

Well Permit #2600027001; 2600027002; 2600027003

Dear Mr. Landolfi:

This correspondence amends the Response Action Outcome issued on **September 15, 2017**, which remains in full force and effect, by correcting the following administrative errors:

1. The Scope of Remediation in the original Response Action Outcome read:

Scope of Remediation: Area(s) of Concern: AOC-1- Unregulated 50-Gallon No. 2 Heating Oil UST; AOC-2- Unregulated 1,000-Gallon No. 2 Heating Oil UST; AOC-3 – Lead Impacted Soil; and no other areas

Has been changed to:

Scope of Remediation: Area(s) of Concern: AOC-1- Unregulated 550-Gallon No. 2 Heating Oil UST; AOC-2- Unregulated 1,000-Gallon No. 2 Heating Oil UST; AOC-3 – Lead Impacted Soil; and no other areas

2. The Last Sentence in the Covenant Not to Sue paragraph (paragraph 5) in the Original Response Action Outcome read:

The Covenant Not to Sue remains effective only as long as the real property referenced above continues to meet the conditions of this Response Action Outcome and applicable permits.

Has been changed to:

The Covenant Not to Sue remains effective only as long as the real property referenced above continues to meet the conditions of this Response Action Outcome.

Please be advised this correspondence, with the above amendments and supplements, corrects administrative errors identified in the original Response Action Outcome issued on **September 15, 2017**. This correspondence should be attached to the original Response Action Outcome and be maintained as part of your environmental records for the above reference site.

Thank you for your attention to these matters. If you have any questions, please contact me at (732)-326-1010, ext. 4350.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert M. Edgar", is written over the "Sincerely," and extends across the signature line.

Robert M. Edgar, LSRP, Principal
Licensed Site Remediation Professional # 584603

Attachment(s): September 15, 2017 Response Action Outcome

c: Township of Woodbridge Department of Health & Human Services
Middlesex County Health Department
Mayor, Township of Woodbridge
Township of Woodbridge Clerk
Middlesex County Clerk
NJDEP Bureau of Case Assignment and Initial Notice

September 15, 2017

Mr. Robert Landolfi
Township of Woodbridge
1 Main Street
Woodbridge, New Jersey 07095

Re: Response Action Outcome.

Remedial Action Type: Unrestricted Use

Scope of Remediation: Area(s) of Concern: AOC-1 - Unregulated 50-Gallon No. 2 Heating Oil UST; AOC-2 - Unregulated 1,000-Gallon No. 2 Heating Oil UST; AOC-3 - Lead Impacted Soil; and No Other Areas.

Case Name: Amerada Hess Corp Recreation Center

Address: 881, 911 & 915 West Avenue

Municipality: Woodbridge

County: Middlesex

Block: 664.03 **Lots:** 1, 2.01, 2.02, 4

Preferred ID: 022902

Communication Center #16-07-21-1610-00; 16-07-21-1613-29; 16-08-10-1519-30

Well Permit #2600027001; 2600027002; 2600027003

Dear Mr. Landolfi:

As a Licensed Site Remediation Professional authorized pursuant to N.J.S.A. 58:10C to conduct business in New Jersey, I hereby issue this Response Action Outcome for the remediation of the areas of concern specifically referenced above. I personally reviewed and accepted all of the referenced remediation and based upon this work, it is my professional opinion that this remediation has been completed in compliance with the Administrative Requirements for the Remediation of Contaminated Sites (N.J.A.C. 7:26C), that is protective of public health, safety and the environment. Also, full payment has been made for all Department fees and oversight costs pursuant to N.J.A.C. 7:26C-4.

This remediation includes the completion of a Site Investigation, Remedial Investigation, and Remedial Action as defined pursuant to the Technical Requirements for Site Remediation (N.J.A.C. 7:26E),

My decision in this matter is made upon the exercise of reasonable care and diligence and by applying the knowledge and skill ordinarily exercised by licensed site remediation professionals in good standing practicing in the State at the time these professional services are performed.

As required pursuant to N.J.A.C. 7:26C-6.2(b)2ii, a copy of all records related to the remediation that occurred at this location is being simultaneously filed with the New Jersey Department of Environmental Protection (Department). These records contain all information upon which I based my decision to issue this Response Action Outcome.

By operation of law a Covenant Not to Sue pursuant to N.J.S.A. 58:10B -13.2 applies to this remediation. The Covenant Not to Sue is subject to any conditions and limitations contained herein. The Covenant Not to Sue remains effective only as long as the real property referenced above continues to meet the conditions of this Response Action Outcome and applicable permits.

CONDITIONS

Pursuant to N.J.S.A. 58:10B-12o, The Township of Woodbridge, and any other person who is liable for the cleanup and removal costs, and remains liable pursuant to the Spill Compensation and Control Act, N.J.S.A. 58:10-23.11 et seq. shall inform the Department in writing, on a form available from the Department, within 14 calendar days after its name or address changes. Any notices you submit pursuant to this paragraph shall reference the above case numbers and shall be sent to:

New Jersey Department of Environmental Protection
Bureau of Case Assignment and Initial Notice
Mail Code 401-05H
401 East State Street, 5th floor
PO Box 420
Trenton, New Jersey 08625-0420

NOTICES

Well Decommissioning

Pursuant to N.J.A.C. 7:9D-3 any wells installed as part of this remediation that will no longer be used for remediation have been properly decommissioned. If any wells have been properly decommissioned, the well driller's well decommissioning report has been submitted to the Bureau of Water Allocation and Well Permitting.

Building Interiors Not Addressed (Non-Child Care)

Please be advised that the remediation that is covered by this Response Action Outcome does not address the remediation of hazardous substances that may exist in building interiors or equipment, including, but not limited to, radon, asbestos and lead. As a result, any risks to human health presented by any building interior or equipment remains. A complete building interior evaluation should be completed before any change in use or re-occupancy is considered.

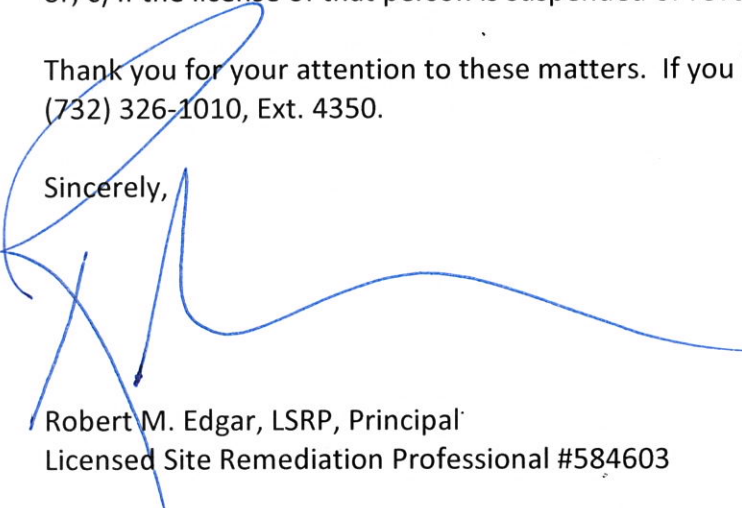
In concluding that this remediation has been completed, I am offering no opinions concerning whether either primary restoration (restoring natural resources to their pre-discharge condition)

or compensatory restoration (compensating the citizens of New Jersey for the lost interim value of the natural resources) has been completed.

Pursuant to N.J.S.A. 58:10C-25, the Department may audit this Response Action Outcome and associated documentation up to three years following issuance. Based on a finding by the Department that a Response Action Outcome is not protective of public health, safety and the environment, the Department can invalidate the Response Action Outcome. Other justifications for the Department's invalidation of this Response Action Outcome are listed in the Administrative Requirements for the Remediation of Contaminated Sites at N.J.A.C. 7:26C-6, including, but not limited to, a Department audit following issuance of this document may be initiated at any time if: a) undiscovered contamination is found that was not addressed by the Response Action Outcome, b) if the Site Remediation Professional Licensing Board conducts an investigation of the Licensed Site Remediation Professional issuing the Response Action Outcome or, c) if the license of that person is suspended or revoked.

Thank you for your attention to these matters. If you have any questions, please contact me at (732) 326-1010, Ext. 4350.

Sincerely,

A large, stylized handwritten signature in blue ink, which appears to be "R. Edgar", is written over the signature line and extends across the middle of the page.

Robert M. Edgar, LSRP, Principal
Licensed Site Remediation Professional #584603

c: Township of Woodbridge Department of Health & Human Services
Middlesex County Health Department
Mayor, Township of Woodbridge
Township of Woodbridge Clerk
Middlesex County Clerk
NJDEP Bureau of Case Assignment and Initial Notice

FACT SHEET
for NJPDES Permit to Discharge
Into the Ground Waters of the State

NAME AND ADDRESS OF APPLICANT:

Amerada Hess (Port Reading) Corporation
P.O. Box 6950
Woodbridge, New Jersey 07095

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

Amerada Hess (Port Reading) Corporation
Cliff Road
Port Reading
Woodbridge, New Jersey

RECEIVING WATER:

Ground Water of the State. The Amerada Hess (Port Reading) Corporation Refinery overlies the Brunswick Shale Formation of Triassic Age. The site is underlain by river deposits of clay and fine sand, and part of the site is reclaimed tidal marsh.

LOCATION OF DISCHARGE:

The Amerada Hess (Port Reading) Corporation Refinery and its terminal is located off Cliff Road in Port Reading, New Jersey. The site consists of Lot 3, Block 756; Lot 1, Block 757; Lot 1B, Block 757; Lot 6, Block 760; Lot 1, Block 760B; Lot 2, Block 760B; Lot 3, Block 760B; Lot 6, Block 1095.

DESCRIPTION OF FACILITY:

The Amerada Hess (Port Reading) Corporation Refinery and Terminal are an existing petroleum products storage and distribution facility that is actively upgrading its refinery for reactivation. The refinery will accept low-sulfur crude oil from tanker ships and, via a catalytic cracker and processing, produce gasoline, fuel oil and other petroleum products. This facility maintains a tank farm (which occupies approximately 66 acres) with appropriate dikes and berms to control stormwater runoff and spills.

DESCRIPTION OF DISCHARGE:

Three existing synthetically lined surface impoundments shall be closed under the terms and conditions of this permit. Said closure shall include the removal and proper disposal of the liquid and solid contents, the liner material, and any contaminated subsoil. The Amerada Hess (Port Reading) Corporation Refinery and its terminal will also be closing an existing landfarm bay under the terms and conditions of this permit. In addition, the Amerada Hess (Port Reading) Corporation shall operate the North and No. 1 landfarms for the degradation of oily wastes such as API separator sludge, oily solids, heat exchanger sludge and tank bottoms. These wastes will be biologically broken down when tilled into the soil. A pH at or above 6.5 shall be maintained to prevent movement of metals through the soil. The landfarms are designed to minimize discharges to the ground water.

PERMIT CONDITION:

An Interim New Jersey Pollutant Discharge Elimination System/IWMF Permit to discharge to ground waters shall be issued with the following conditions. This permit shall only apply to the discharges that occur from the one landfarm and three surface impoundments to be closed and the two other landfarms that are to be operated.

FACT SHEET
for Major Modification to RCRA-NJPDES/IWMF Operating Permit
for Hazardous Waste Land Treatment Unit

NAME AND ADDRESS OF APPLICANT:

Amerada Hess (Port Reading) Corporation
One Hess Plaza
Woodbridge, New Jersey 07095

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

Amerada Hess (Port Reading) Corporation
750 Cliff Road
Port Reading
Woodbridge, New Jersey 07064

RECEIVING WATER:

Ground Waters of the State. The Amerada Hess (Port Reading) Corporation Refinery overlies the Brunswick Shale Formation of Triassic Age. The site is underlain by river deposits of clay and fine sand, and part of the site is a reclaimed tidal marsh.

LOCATION OF DISCHARGE:

The Amerada Hess (Port Reading) Corporation Refinery and its terminal are located off Cliff Road in Port Reading, New Jersey. The site consists of Lot 3, Block 756; Lot 1, Block 757; Lot 1B, Block 757; Lot 6, Block 760; Lot 1, Block 760B; Lot 2, Block 760B; Lot 3, Block 760B; Lot 6, Block 1095.

DESCRIPTION OF THE FACILITY: ***Training Center - Block 664.03, Lots 1, 2.01, 2.02, 4**

The Amerada Hess (Port Reading) Corporation Refinery is an existing petroleum products storage and distribution facility. The refining facility accepts low-sulfur vacuum gas oil from tanker ships and, via a catalytic cracker and processing, produces gasoline, fuel oil and other petroleum products.

DESCRIPTION OF DISCHARGE TO LAND TREATMENT UNIT:

The NJDEPE intends to issue a Major Modification to the Industrial Waste Management Facility Permit to allow the land application of F-037 waste (petroleum refining waste) to the No. 1 Land Treatment Unit (landfarm). F-037 waste has similar treatment characteristics to petroleum waste previously applied to the landfarm. Waste types K-049, K-050, K-051, K-052 and P-110 have been removed from the Operating Permit due to changes in federal Resource Conservation and Recovery Act (RCRA) regulations. The operation of the landfarm

and the application of the F-037 waste must be in accordance with the terms and conditions of the 31 March 1988 Operating Permit and all applicable federal regulations. The landfarm is a lined unit with a leachate collection system.

PERMIT CONDITION:

According to the attached specific conditions. This permit applies only to the No. 1 Landfarm.

